



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUL 24 2014

Mr. Richard J. Johnson
Town Manager
Town of Glastonbury
2155 Main Street
Glastonbury, Connecticut 06033-6523

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c)
and § 761.79(h)
Gideon Welles School
Glastonbury, Connecticut

Dear Mr. Johnson:

This is in response to the Town of Glastonbury (the Town) Notification¹ for approval of a proposed plan to address PCB contamination located in the building known as Gideon Welles School, ("the Site") at 1029 Neipsic Road, Glastonbury, Connecticut. The Site contains PCB-contaminated materials that exceed the allowable PCB levels under 40 CFR § 761.20(a), § 761.61, and § 761.62. Specifically, PCBs have been found in caulk and in the adjacent building substrates (i.e., brick, concrete and concrete masonry units (CMU)).

In its Notification the Town has proposed the following PCB remediation plan;

- Remove PCB caulk, the original 1965 window assemblies, including glazing and adjacent *porous surfaces* (i.e., one course of brick (i.e., minimum of 8 inches), and wooden soffits and ceiling trim) and dispose as a *PCB bulk product waste* in accordance with § 761.62(b)

¹ The Notification was prepared by Fuss & O'Neill Enviroscience, LLC, on behalf of the Town of Glastonbury to satisfy the requirements under 40 CFR §§ 761.61(a) and (c). Information was submitted dated March 18, 2014 (Risk-Based Disposal Approval Plan) and July 10, 2014 (Response to EPA Comments and Revised Plan). These submittals shall be referred to as the "Notification".

- Remove *PCB remediation waste* (i.e., asphalt around building perimeter and PCB caulk from the 2001 replacement windows) and dispose of as a greater than or equal to (\geq) 50 ppm *PCB remediation waste* in accordance with § 761.61(a)(5)(i)(B)(2)(iii)
- *Non-porous surfaces* (i.e., steel lintels and beams, vents, and 2001 replacement window frames) will be cleaned to the standard of $< 1 \mu\text{g}/100 \text{ cm}^2$
- Encapsulate poured concrete at the base of the windows, and vertical concrete block walls in stairwells, to a distance of 3 inches on both sides of the joint with an epoxy coating
- Conduct characterization sampling of the soil underlying the asphalt in accordance with 40 CFR 761 Subpart N
- Conduct verification sampling in accordance with Subpart O for *porous surfaces* (i.e., window and vent surrounds except where being encapsulated) or Subpart P for *non-porous surfaces* (i.e., steel lintels, beams, vents and 2001 window frames) to confirm that the PCB cleanup standards of $< 1 \text{ ppm}$ and $< 1 \mu\text{g}/100 \text{ cm}^2$, respectively, have been met

The Town has determined that glazing, which has PCB concentrations at $< 50 \text{ ppm}$ meets the criteria for an *Excluded PCB Product* under § 761.3. Under the PCB regulations, *Excluded PCB Products* are authorized for use and thus there is no requirement for decontamination of surfaces that are in contact with the $< 50 \text{ ppm}$ PCB products. The Town is proposing to dispose of the $< 50 \text{ ppm}$ PCB glazing with the windows assemblies.

Based on the EPA's review, the information provided in the Notification meets the requirements under § 761.62 and § 761.79(h) for abatement of PCB caulk and §§ 761.61(a) and (c) for decontamination and/or encapsulation of PCB-contaminated building surfaces. EPA finds that the proposed encapsulation should effectively prevent direct exposure of these PCB-contaminated surfaces to building users provided the encapsulated surfaces are maintained. EPA has determined that management in place of PCB-contaminated *porous surfaces* with encapsulation will not pose an unreasonable risk of injury to health or the environment. As such, EPA may approve the encapsulation under § 761.61(c).

The Town may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62; § 761.79(h); its Notification; and, this Approval, subject to the conditions of Attachment 1. Under this Approval, EPA is reserving its right to require additional investigation or mitigation measures should the results of the long-term monitoring indicate an unreasonable risk of injury to the building users.

This Approval does not provide for cleanup and disposal of PCB-contaminated soils since additional sampling is necessary to define the nature and extent of the contamination. Upon completion of the investigation of soils at the Site, the Town may request a modification to this Approval to incorporate cleanup of PCB-contaminated soils or the Town may submit a separate cleanup and disposal notification under 40 CFR § 761.61 (see Attachment 1, Condition 1).

Please be aware that this Approval requires the Town to conduct outreach activities for the school community, including students, parents, and school employees concerning the PCB remediation work. Documentation of the outreach effort shall be submitted to EPA. (Attachment 1, Approval Condition 19)

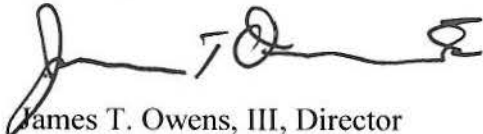
Please note that the Town will be required to record a notation on the deed for the Site as required under 40 CFR § 761.61(a)(8) since PCBs at > 1 ppm will remain on the Site.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in black ink, appearing to read 'James T. Owens, III', with a stylized flourish at the end.

James T. Owens, III, Director
Office of Site Remediation & Restoration

cc Robert May, Fuss & O'Neill
Gary Trombly, CTDEEP
Brian Toal, DPH
File

Attachment 1 – PCB Approval Conditions

ATTACHMENT 1:

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS
GIDEON WELLES SCHOOL (the Site)
1029 NEIPSIC ROAD
GLASTONBURY, CONNECTICUT**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Site and identified in the Notification.

This Approval does not address the cleanup of PCB-contaminated soils as the nature and extent of the contamination has not been defined. Upon completion of the soil characterization, the Town of Glastonbury (the Town) may request a modification to this Approval to incorporate cleanup of the soils under this Approval (see Condition 23) or the Town may submit a separate cleanup plan in accordance with 40 CFR § 761.61.

2. The Town shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. The Town must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the Town shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. The Town is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town has or receives information indicating that the Town or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town are authorized to conduct the activities set forth in the Notification. The Town is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the Town from compliance with any applicable requirements of federal, state or local law; or 3) release the Town from liability for, or otherwise resolve any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from the Town of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. The Town shall submit the following information to EPA:
 - a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
 - b. a contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the containment and air monitoring that will be employed during abatement activities. This work plan should also include information on how and where wastes will be stored and disposed of, and on how field equipment will be decontaminated; and,
 - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

DECONTAMINATION AND DISPOSAL CONDITIONS

12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
13. All visible residues of PCB caulk (i.e., *PCB bulk product waste*) shall be removed as described in the Notification.
14. Following encapsulation of PCB-contaminated *porous surfaces* (i.e., concrete at the base of the windows and concrete masonry units (CMU) in stairwells) with an epoxy coating, sampling shall be conducted to determine the effectiveness of the encapsulation.
 - a. Wipe sampling of encapsulated *porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu\text{g}/100\text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
 - b. In the event that the PCB concentration of any wipe sample is greater than ($>$) $1\text{ }\mu\text{g}/100\text{ cm}^2$, and if this standard cannot be achieved with the application of additional encapsulant, the Town shall contact EPA for further discussion and direction on alternatives.
15. The decontamination standard for *non-porous surfaces* (i.e., steel lintels and beams, vents, and 2001 replacement window frames) shall be less than or equal to (\leq) $1\text{ }\mu\text{g}/100\text{ cm}^2$
 - a. Post-decontamination verification sampling shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e., $\mu\text{g}/100\text{ cm}^2$) and in accordance with Subpart P.
 - b. In the event decontaminated *non-porous surfaces* have PCB concentrations at $> 1\text{ }\mu\text{g}/100\text{ cm}^2$ PCBs, the Town may conduct additional decontamination to achieve the required $\leq 1\text{ }\mu\text{g}/100\text{ cm}^2$ decontamination standard for use or shall be required to remove and dispose of the *non-porous surfaces* in accordance with § 761.61(a).
 - c. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.

16. The cleanup standard for *PCB remediation waste* (i.e., brick) shall be ≤ 1 part per million (ppm) for unrestricted use or disposal.
 - a. All verification samples of bulk *PCB remediation waste* (i.e., brick) shall be collected on a bulk basis (i.e., mg/kg) in accordance with 40 CFR 761 Subpart O.
 - b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.
17. Post-abatement indoor surface sampling and indoor air sampling shall be conducted to document the effectiveness of the abatement work and encapsulation.
 - a. Wipe sampling of indoor surfaces shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu\text{g}/100\text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to Subpart Q. The laboratory reporting limit shall be $\leq 1\text{ }\mu\text{g}/100\text{ cm}^2$.
 - b. Indoor air sampling shall be conducted in accordance with EPA Method TO-10A or EPA Method TO-4A. Sufficient sample volumes shall be collected to provide a laboratory reporting limit of $\leq 0.050\text{ }\mu\text{g}/\text{m}^3$ for total PCBs. PCB analysis shall be conducted for PCB homologues and/or PCB congeners.
18. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.
 - a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

19. The Town shall conduct outreach activities for the school community, including students, parents, and school employees on the PCB remediation work. The Town shall submit information on its outreach activities within 30 days of receipt of this Approval.

DEED RESTRICTION AND USE CONDITIONS

20. Within thirty (30) days of completing the activities described in the Notification and in the Approval, the Town shall submit for EPA review and approval, a draft deed restriction for the Site where PCBs > 1 ppm remain. The deed restriction shall include: a description of the extent and levels of contamination at the Site following abatement; a description of the actions taken at the Site; a description of the use restrictions for the Site, if any; and, the long-term monitoring and maintenance requirements on the Site. Within seven (7) days of receipt of EPA's approval of the draft deed restriction, the Town shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

21. Within 60 days of completion of the work authorized under this Approval, the Town shall submit for EPA's review and approval, a detailed monitoring and maintenance implementation plan (MMIP) for the epoxy coating and for indoor air. The Town shall incorporate any changes to the MMIP required by EPA.
 - a. The MMIP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols, sampling frequency, and analytical criteria; and, reporting requirements, as applicable.
 - b. The MMIP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including teachers, parents, student, other on-site workers, and interested stakeholders.
 - c. The MMIP also shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the epoxy coating encapsulating the PCB-contaminated surfaces.
 - d. The Town shall submit the results of these long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMIP is necessary in order to monitor and/or evaluate the long-term effectiveness of the epoxy coating.

- e. Activities required under the MMIP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.
- 22. The Town shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the Town to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
- 23. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
- 24. If such modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from the Town to make a determination regarding potential risk.
- 25. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

- 26. The Town shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal and the analytical sampling shall be established and maintained by the Town in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
- 27. As required under Condition 21 of this Approval, the Town shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMIP to be approved by EPA.

28. The Town shall submit a final report as both a hard copy and electronic version, to the EPA within 90 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities with photo-documentation; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of; copies of manifests and bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer. The Report shall also include a copy of the recorded deed restriction and a certification signed by a Town official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.
29. Required submittals shall be mailed to:
- Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 – (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527
30. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1